

## **REMARKS**

In an Office Action mailed January 25, 2010, claims 1-25 were rejected. Herein claims 1, 2, 6-8, 22 and 24 have been amended. Applicants respectfully submit that no new matter has been added. Additionally, claims 4, 5, 9, 10, 13-21 and 25 have been cancelled without prejudice or disclaimer to the subject matter therein. Applicants respectfully request continued examination and reconsideration based on the following.

Initially, Applicants would like to thank Examiner King for the courtesies extended to Applicants' representative during the telephone interview conducted on March 23, 2010. During the interview, Applicants' representative explained why it is believed that the claimed invention is patentable over the cited references. In this regard, Applicants note that an agreement on the claims was not reached.

### **I. Claim Rejections under 35 U.S.C. 112**

Claims 9 and 10 were rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Applicants note that claims 9 and 10 have been cancelled. Accordingly, Applicants respectfully submit that the rejection of claims 9 and 10 is moot in light of the cancellation of claims 9 and 10.

### **II. Claims Rejections under 35 U.S.C. 103(a)**

Claims 1, 2, 4, 17, 19, 20-22, and 25 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ono (US 2004/0139020) in view of Shinzaki et al. (US 7,007,298, hereafter "Shinzaki"), and claim 5 was rejected under 35 U.S.C. 103(a) as being unpatentable over Ono in view of Shinzaki, and further in view of Ogawa (US 2005/0027990).

By this amendment, Applicants note that claims 1, 2, and 22 have been amended to incorporate the subject matter of cancelled claim 5. Applicants respectfully submit that claims 1, 2, and 22 are patentable over any combination of Ono, Shinzaki, and Ogawa based on the following remarks.

Amended claim 2 recites the features of a receiving unit operable to wirelessly receive, from wireless IC tags attached to objects carried by a user, a plurality of pieces of tag certification information for identifying the wireless IC tags attached to the objects, respectively, and an update unit operable to, if a predetermined condition for update is satisfied, acquire at least two certification ID codes out of a plurality of certification ID codes received by the receiving unit by storing the at least two acquired certification ID codes into a tag verification information storage unit as verification ID codes. Applicants respectfully submit that this combination of features of amended claim 2 is not disclosed, suggested, or otherwise rendered obvious by any combination of Ono, Shinzaki, and Ogawa.

On page 15 of the Office Action, the Examiner states that the update unit of amended claim 2 is not disclosed by Ono or Shinzaki. However, the Examiner takes the position that this feature of amended claim 2 is disclosed by Ogawa. Applicants note that the Examiner takes the position that the update unit of amended claim 2 corresponds to the updating section as disclosed by Ogawa. In particular, the Examiner appears to take the position that the feature of acquiring at least two certification ID codes, as recited by amended claim 2, corresponds to the updating section storing a transformation result and presentation symbol string as disclosed in Ogawa. Applicants respectfully disagree that the update unit of amended claim 2 is disclosed by Ogawa.

Ogawa is directed to an authentication apparatus including a generating section 402, an updating section 405, a storing section 403, a receiving unit 406, and an authentication section 407 (FIG. 4). The generating section 402 generates a presentation symbol string for use during a next authentication request from a user ([0080]). The generated presentation symbol string is transmitted to the user, and the updating section 405 causes the generated presentation symbol string to also be stored in a table 501 located in the storing section 403 ([0084]-[0085]). Subsequently, a transformed symbol string (i.e., a password) from the user is received by the receiving section 406, and the authentication section 407 authenticates the user if the received transformation symbol string matches a result obtained by applying a transformation rule to the stored generated presentation symbol string ([0087]).

Additionally, while Ogawa discloses authentication by using two pieces of information (i.e., the internally generated presentation symbol string and the externally generated transformation result received from the user), Applicants note that the two pieces of information are some sort of variation of the internally generated presentation symbol string.

Further, Applicants note that an embodiment of Ogawa discloses that the update unit causes the result obtained by applying a transformation rule to the internally generated presentation symbol string to be stored in place of the generated presentation symbol string in the table 501 located in the storing unit 403 ([0094]). Accordingly, it appears Ogawa merely discloses storing a plurality of a single piece of information used in the authentication (i.e., a plurality of internally generated presentation symbol strings or a plurality of results obtained by applying a transformation rule to the internally generated presentation symbol strings).

Thus, Ogawa merely discloses an update section that acquires a piece of information generated in the apparatus itself (i.e., the generated presentation symbol string or the result of transforming the generated presentation symbol string) and stores the internally generated piece of information in the storage unit. In other words, Ogawa fails to disclose that a plurality of pieces of external information is received, and that the plurality of pieces of external information is stored for use in authentication.

In contrast to Ogawa, amended claim 2 is directed to a receiving unit that wirelessly receives (i.e., externally receives) a plurality of pieces of tag certification information from wireless IC tags attached to a user, and that the updating unit acquires at least two pieces of information from the plurality of pieces of tag certification information received by the receiving unit and updates information stored in the tag verification storage unit with the externally acquired at least two pieces of information. In other words, according to amended claim 2, the update unit acquires at least two pieces of information from outside the authentication apparatus, and updates the information stored in the tag verification information storage unit.

In particular, as noted above, amended claim 2 recites the features of a receiving unit operable to wirelessly receive, from wireless IC tags attached to objects carried by a user, a

plurality of pieces of tag certification information for identifying the wireless IC tags attached to the objects, respectively, and an update unit operable to, if a predetermined condition for update is satisfied, acquire at least two certification ID codes out of a plurality of certification ID codes received by the receiving unit by storing the at least two acquired certification ID codes into a tag verification information storage unit as verification ID codes.

Additionally, it should be noted that the above noted features of amended claim 2 provide an advantageous benefit of when a user wears objects having wireless ID tags and the objects may differ from a previous day (such as clothes, glasses, or the like), the user can use a desired function of the authentication apparatus as long as the level of match between a plurality of verification ID codes and a plurality of certification ID codes satisfies a predetermined condition. In other words, at least two pieces of information are obtained and updated, thereby a plurality of verification ID codes are always held and it is possible to obtain a level of match between the plurality of verification ID codes and the plurality of certification ID codes each time a use of a function is requested. Accordingly, the presently claimed invention produces an advantageous effect that it is possible to realize authentication that is more flexible than that of a conventional apparatus.

In view of the above, Applicants respectfully submit that any combination of Ono, Shinzaki, and Ogawa fails to disclose, suggest, or otherwise render obvious the features of a receiving unit operable to wirelessly receive, from wireless IC tags attached to objects carried by a user, a plurality of pieces of tag certification information for identifying the wireless IC tags attached to the objects, respectively, and an update unit operable to, if a predetermined condition for update is satisfied, acquire at least two certification ID codes out of a plurality of certification ID codes received by the receiving unit by storing the at least two acquired certification ID codes into a tag verification information storage unit as verification ID codes, as recited by amended claim 2.

Therefore, Applicants respectfully submit that claim 2 is patentable over any combination of Ono, Shinzaki, and Ogawa.

Regarding claim 1, Applicants note that claim 1 has been amended in a manner similar to claim 2. In particular, claim 1 recites the features of a receiving unit operable to wirelessly receive, from wireless IC tags attached to objects carried by a user, a plurality of pieces of tag certification information for identifying the wireless IC tags attached to the objects, respectively, and an update unit operable to, if a predetermined condition for update is satisfied, acquire at least two certification ID codes out of a plurality of certification ID codes received by the receiving unit, and update contents of a tag verification information storage unit by storing the at least two acquired certification ID codes into the tag verification information storage unit as verification ID codes. Applicants respectfully submit that this combination of features of claim 1 is not disclosed, suggested, or otherwise rendered obvious by any combination of Ono, Shinzaki, and Ogawa for reasons similar to those discussed above with respect to claim 2. Accordingly, Applicants respectfully submit that claim 1 is patentable over any combination of Ono, Shinzaki, and Ogawa.

Regarding claim 22, Applicants note that claim 1 has been amended in a manner similar to claim 2. In particular, claim 22 recites the features of wirelessly receiving, from wireless IC tags attached to objects carried by a user, a plurality of pieces of tag certification information for identifying the wireless IC tags attached to the objects respectively, acquiring, if a predetermined condition for update is satisfied, at least two certification ID codes out of a plurality of certification ID codes received by the receiving step, and updating contents of a tag verification information storage unit by storing the at least two acquired certification ID codes into the tag verification information storage unit as verification ID codes. Applicants respectfully submit that this combination of features of claim 22 is not disclosed, suggested, or otherwise rendered obvious by any combination of Ono, Shinzaki, and Ogawa for reasons similar to those discussed above with respect to claim 2. Accordingly, Applicants respectfully submit that claim 22 is patentable over any combination of Ono, Shinzaki, and Ogawa.

Claims 5, 6, 8, 9, 11, 13, 14, and 16 was rejected under 35 U.S.C. 103(a) as being unpatentable over Ono in view of Shinzaki, and further in view of Ogawa. Applicants note that claims 6, 8, and 11 are pending, and claims 5, 9, 13, 14, and 16 have been cancelled. Additionally, Applicants note that claims 6, 8, and 11 depend from claim 2. Accordingly,

Applicants respectfully submit that claims 6, 8, and 11 are patentable over any combination of Ono, Shinzaki, and Ogawa based at least on their dependency from claim 2.

Claims 7 and 15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ono in view of Shinzaki and Ogawa, and further in view of Arens (US 2001/0030603). Claim 7 is pending, and claim 15 has been cancelled. Applicants note that claim 7 depends from claim 2. Applicants respectfully submit that Arens fails to provide disclosure that would obviate the above-mentioned deficiencies of Ono, Shinzaki, and Ogawa. Accordingly, Applicants respectfully submit that claim 7 is patentable over any combination of Arens, Ono, Shinzaki, and Ogawa based at least on its dependency from claim 2.

Claims 10 and 12 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ono in view of Shinzaki and Ogawa, and further in view of Omae et al. (US 2006/0174121, hereafter “Omae”). Applicants note that claims 10 and 12 depend from claim 2. Applicants respectfully submit that Omae fails to provide disclosure that would obviate the above-mentioned deficiencies of Ono, Shinzaki, and Ogawa. Accordingly, Applicants submit that claims 10 and 12 are patentable over any combination of Omae, Ono, Shinzaki, and Ogawa based at least on their dependency from claim 2.

Claim 18 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Ono in view of Shinzaki, and further in view of Zhang (US 2004/0064698). Applicants note that claim 18 has been cancelled. Accordingly, Applicants respectfully submit that the above rejection of claim 24 is moot in light of the cancellation of claim 24.

Claim 24 was rejected under 35 U.S.C. 103(a) as being unpatentable over Ono in view of Shinzaki. Applicants note that claim 24 has been amended in a manner similar to claim 24. In particular, claim 24 recites the features of wirelessly receiving, from wireless IC tags attached to objects carried by a user, a plurality of pieces of tag certification information for identifying the wireless IC tags attached to the objects respectively, acquiring, if a predetermined condition for update is satisfied, at least two certification ID codes out of a plurality of certification ID codes received by the receiving step, and updating contents of a tag verification information storage

unit by storing the at least two acquired certification ID codes into the tag verification information storage unit as verification ID codes. Applicants respectfully submit that this combination of features of claim 24 is not disclosed, suggested, or otherwise rendered obvious by any combination of Ono, Shinzaki, and Ogawa for reasons similar to those discussed above with respect to claim 2. Accordingly, Applicants respectfully submit that claim 24 is patentable over any combination of Ono, Shinzaki, and Ogawa.

### **III. Conclusion**

Therefore, Applicants respectfully submit that independent claims 1, 2, 23, and 24, as well as those depending therefrom, are clearly allowable over the prior art of record.

In view of the foregoing amendments and remarks, Applicants respectfully submit that the present application is clearly in condition for allowance. An early notice thereof is earnestly solicited.

If, after reviewing this Amendment, the Examiner feels there are any issues remaining with must be resolved before the application can be passed to issue, Applicants respectfully request that the Examiner contact the undersigned by telephone in order to resolve such issues.

Respectfully submitted,

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